IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 19-11341

Carmen I. Rivera : Chapter 13

Judge Eric L. Frank

Debtor(s) : **************

:

Wells Fargo Bank, N.A. : Date and Time of Hearing

Movant, : Place of Hearing

vs : September 17, 2019 at 9:30 a.m.

Carmen I. Rivera : U.S. Bankruptcy Court

Emiliano Rivera : 900 Market Street, Courtroom #1

: Philadelphia, PA, 19107

William C. Miller

Respondents.

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Wells Fargo Bank, N.A. has filed a Motion for Releif from the Automatic Stay and Co-Debtor Stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before September 6, 2019, you or your attorney must do <u>ALL</u> of the following:
 - A. File an answer explaining your position at:

Clerk, U.S. Bankruptcy Court

U.S. Bankruptcy Court 900 Market Street Philadelphia, PA, 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

United States Trustee Office of the U.S. Trustee 833 Chestnut Street, Suite 500 Philadelphia, PA 19107

William C. Miller P.O. Box 1229 Philadelphia, PA 19105 ecfemails@ph13trustee.com

Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on September 17, 2019 at 9:30 a.m. in U.S. Bankruptcy Court, 900 Market Street, Courtroom #1, Philadelphia, PA, 19107.
- 4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE: __August 22, 2019__

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In re:

Case No.: 19-11341

Carmen I. Rivera

Chapter 13

Judge Eric L. Frank

Debtor(s):

Wells Fargo Bank, N.A.

: Date and Time of Hearing

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VS

September 17, 2019 at 9:30 a.m.

: U.S. Bankruptcy Court

Carmen I. Rivera **Emiliano Rivera**

: 900 Market Street, Courtroom #1

: Philadelphia, PA, 19107

William C. Miller

Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Notice of Motion, Response Deadline, and Hearing Date regarding Motion for Releif from the Automatic Stay and Co-Debtor Stay was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500, Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Paul H. Young, Attorney for Carmen I. Rivera, 3554 Hulmeville Road, Suite 102, Bensalem, PA 19020, support@ymalaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on August 22, 2019:

Carmen I. Rivera, 320 Dorrance Street, Bristol, PA 19007

Carmen I. Rivera and Emiliano Rivera, 320 Dorrance St, Bristol, PA 19007

Pennsylvania Department of Revenue, Bankruptcy Division, PO Box 280946, Harrisburg, PA 17128

Select Portfolio Svcin, 1401 Deerwood Park Blvd, Jacksonville, FL 32256

DATE: <u>August 22, 2019</u>

/s/ Karina Velter

Karina Velter, Esquire (94781) Adam B. Hall (323867) Sarah E. Barngrover (323972) Manley Deas Kochalski LLC P.O. Box 165028

Columbus, OH 43216-5028 Telephone: 614-220-5611

Fax: 614-627-8181 Attorneys for Creditor

The case attorney for this file is Karina

Velter.

Contact email is kvelter@manleydeas.com